

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
	:	
v.	:	20 Cr. 330 (AJN)
	:	
GHISLAINE MAXWELL,	:	NOTICE OF MOTION
	:	
Defendant.	:	ORAL ARGUMENT REQUESTED
	:	
-----	X	

**DEFENDANT GHISLAINE MAXWELL'S NOTICE OF MOTION UNDER THE
FOURTH AMENDMENT, *MARTINDELL*, AND THE FIFTH AMENDMENT TO
SUPPRESS ALL EVIDENCE OBTAINED FROM THE GOVERNMENT'S SUBPOENA
TO [REDACTED] AND TO DISMISS COUNTS FIVE AND SIX
(Pretrial Motion # 11)**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, Defendant Ghislaine Maxwell, through counsel, hereby moves to suppress under the Fourth Amendment, *Martindell*, and the Fifth Amendment all evidence obtained from the government's subpoena to [REDACTED] and to dismiss Counts Five and Six.

Dated: January 25, 2021
New York, New York

Respectfully submitted,

s/ Jeffrey S. Pagliuca

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